

February 2, 2009

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David Navecky  
STB Finance Docket No. 34658  
Surface Transportation Board  
395 E Street SW  
Washington DC 20423-0001

**Subject: STB Finance Docket No. 34658, Alaska Railroad-Northern Rail  
Extension, Draft EIS Comments**

Dear Mr. Navecky,

We are concerned about how the Northern Rail Extension project may affect our property; the 40 property owners on Fivemile Clear Creek (referred to in the report as Fivemile Clearwater River); the creek itself; hunting, fishing, and recreation for all property owners and users in the area; and access to properties and hunting grounds in the area of the creek. The comments we are providing are in regards to the Tanana River crossing near Salcha, the Central Alternatives 1 and 2, and the associated connectors. Specifically, our comments are:

1. Figure 2-17, Tanana bridge Alternative 2, shows a channel blocked with “fill” on the west side of the Tanana to accommodate the bridge. This is the channel that is used to access the mouth of Fivemile Clear Creek. Creek flow alone would not likely be enough to maintain navigability as it spreads over the wide channel bed, so blocking Tanana flow to this channel would cut off summer access to the creek and the 40 properties on it. There is no other reasonable summer access to the creek. Additionally, in reference to this same figure, are concerns about what impact this will have to the fish population on the creek. The grayling migrate annually, and there are annual salmon runs. This alternative could be detrimental to both, thereby leading to serious environmental concerns further up the food chain.
2. Access concerns:
  - a. Figure 13-33 shows one possible crossing of railroad line near the headwaters of the creek and one near the mouth of Fivemile Clear Creek. According to this Draft EIS, crossing the railroad line will not be allowed in other locations. This cuts off winter access to most properties on the creek. The creek doesn’t freeze in the winter, so the creek cannot be used as a trail from the crossings upstream or downstream to the properties. Landowners have built their own winter trails where they are needed to

- access their properties. Drawing a line across these cuts off their winter access to their properties.
- b. Central Alternative 1 and 2 (and associated connectors) draw lines across prime hunting areas and access to other areas that cannot be crossed for hunting. There are existing trails that cross the proposed line locations. Many of us built our cabins out there for hunting, but rail lines will greatly reduce that area that can be hunted.
  - c. ADNR regulations allow for the construction of the above-mentioned trails (Draft EIS p.13-25) and has stated they “. . . would require accommodation of these legal features.” yet the railroad has not addressed how they intend to resolve this conflict. In fact, the Draft EIS states that “In roadless area, off-road vehicles would be prohibited from crossing the rail line at non-designated points.” (Draft EIS p.13-25). Resolution to this conflict should be provided in this Draft EIS so that the public has the chance to comment on it.
3. Note that the Fivemile Clear Creek is used by jetboats and airboats. Bridges must be built with adequate clearance for the taller airboats.
  4. I cannot find info in the Draft EIS on where a construction camp or construction storage area might be located in the Fivemile Clear Creek area. This could have significant environmental impacts and a proposed location should be identified and environmental concerns addressed in this document.
  5. Note that construction closures of the creek and popular hunting grounds should be planned to not coincide with hunting season. People with property on the navigable waterways should be notified of such closures in advance, not when they get partway up the creek with a boatload of supplies and plans to spend a weekend at their cabins.
  6. No noise and vibration analysis is included for this area as “. . . no receptors were identified near the proposed rail line.” (Draft EIS p. 9-6,). There are 40 privately owned properties on Fivemile Clear Creek, about ½ of which have cabins that are used regularly. There is also wildlife in the area that would be affected by the noise and vibration of 10 train trips through there per day. A noise and vibration analysis should be done for this area.
  7. Between Fivemile Clear Creek and the Tanana, behind the private properties, is a clear-running stream that sustains a salmon population and likely other fish. I cannot tell from maps provided if Alternative 2 affects this stream, but it should be considered. This is the area off of BLM managed military land.
  8. We believe it is essential to have a 3<sup>rd</sup>-party analysis of impacts the proposed railroad on migratory and resident moose populations in Tanana flats. The draft EIS is vague on the impact of the construction and operation of the proposed railroad on this State Intensive Management moose population and according to

the ADF&G moose biologist, ARRC has provided no specific plan or data regarding this issue.

9. Putting out Draft EIS just before Christmas is bound to generate less comments due to folks busy with the holidays and holiday travel—environmental document preparers know this yet released this Draft EIS just a couple weeks before Christmas. This seems suspiciously strategic.
10. Where are proposed borrow pit sites? Their impacts should be evaluated and addressed.
11. The railroad project website is not being updated and when I last checked did not include mention of release of this Draft EIS—an attempt to minimize comments by not making a good effort to get the word out?
12. During a wildfire a couple years ago near the area of Fivemile Clear Creek, fire crews said they would not fight fire on the ground if cabins were endangered due to the risk of unexploded ordnance in the area. Unexploded ordnance is not addressed in the section on hazardous materials. At that time ADNR revealed that the whole area south of the Tanana River from Delta to Nenana was considered by the military to have a HIGH probability of unexploded ordinance scattered throughout. As the fire spread towards Fivemile Clear Creek in 2007, the US Army sent a patrol to sweep a 100' swath around each cabin should it have become necessary to put smoke jumpers on the ground. The draft EIS does not address this eminent danger to human life during the construction or operational phases of the railroad.
13. Bald eagles and great horned owls are seen regularly and annually near our cabin located at Lat 64° 19.359' Long 146° 55.712'. Are the nesting sites surveyed and protected?
14. Properties in the Fivemile Clear Creek area were distributed and described as “remote parcels” by the State and Borough. The close proximity of a railroad will arguably change the property description as well as the owners’ enjoyment of solitude in the Fivemile Clear Creek area for the worse. The Railroad will also limit customary and historic access adjacent State lands thereby further diminishing the recreational and remote value of these properties.

Thank you for this opportunity to comment.

Sincerely,

Steven Vincent  
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